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To Secretary of State cc Nicholas Kroll Ruth MacKenzie  
Andrew Ramsay Bill Bush  
From [REDACTED] Diana Kahn Ed Richards  
File Ref [REDACTED]  
Date 23 November 2001 [REDACTED]

**BRIEFING FOR THE ANNOUNCEMENT OF OUR CONSULTATION ON MEDIA OWNERSHIP**

Attached is briefing for Monday's announcement. It comprises:

- Annex A - the core messages we are putting out;
- Annex B - a more detailed summary of our principles;
- Annex C - Q+A
- Annex D - a summary of how our proposals represent policy developments from the White Paper;
- Annex E - how the proposals relate to existing legislation;
- Annex F - statistics on the audience share of the major media companies, for background;
- Annex G - the Press Notice - you are asked to agree this on Monday morning.

I also submit a printed copy of the paper itself.

[REDACTED]

## CORE MESSAGES

- Media ownership rules exist to retain the balance of different media viewpoints that make democracy work, but they must also promote the most competitive market possible for the benefit of industry.
- The existing rules are outdated:
  - they are not flexible enough to respond to the rapid change we have seen in media markets;
  - they appear inconsistent and directed at particular areas of the media industries.
- Given the possibilities of new technologies and new services to offer consumers a greater choice there may be less need for ownership rules in the future. In light of this we are determined to be as deregulatory as possible, and to consider different methods of regulation in the future.
- However, for the time being we must legislate for the present situation, where most people engage with the media in its traditional forms, and media ownership rules remain the best way of doing this.
- Our key aims are:
  - to retain a diversity of content from a plurality of sources;
  - to promote competition;
  - to be flexible in allowing legislation to adapt to changing market conditions;
  - to provide as much predictability as we can for business.
- Striking the right balance will be difficult but not impossible, and we would like as many people as possible to help us by engaging in the consultation process.

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 SUMMARY OF OUR PRINCIPLES
 

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 Why we need ownership rules
 

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- Ownership rules must attain two aims. They must:
  - retain the balance of media viewpoints that make democracy work
  - promote the most competitive market possible for the benefit of industry

Democracy, plurality and diversity

- Our democracy and our cultural vitality depend on the availability of a range of different media voices, views and styles. The ownership of our newspapers, television and radio is therefore of the utmost importance. That is why the Government is concerned to ensure that citizens can receive a diversity of media content from a plurality of sources.
- Diversity is about having a wide range of content and in the White Paper, a *New Future for Communications*, we set out the commitments to public service broadcasting and positive content regulation that we believe will be sufficient to ensure this diversity.
- Plurality is not about content but the source of that content, the 'voice' behind it - the owner. A plurality of voices should:
  - ensure no individual has excessive control over the democratic process;
  - provide a plurality of sources of news and editorial opinion, preserving the culture of dissent and argument on which our democracy rests;
  - prevent the emergence of any one source able to control the news agenda by the inclusion/omission of particular stories;
  - maintain our cultural vitality by ensuring that different companies exist to produce different styles of programming and publishing, each with a different look and feel.
- We therefore need regulation that is specifically directed to ensure plurality and that is why we have imposed rules on media ownership.

A competitive market

- At the same time, we are determined to promote the most competitive market possible for the benefit of both businesses and consumers.
- We want to allow increased growth and investment, which in turn should prompt innovation, and provide cheaper and better products for the consumer.

We will therefore be as deregulatory as we can whilst ensuring the existence of an adequate plurality of voices.

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- Some suggest that competition law alone can ensure plurality. Through the Competition Act of 1998 and the forthcoming Enterprise Bill, competition law is being improved, to provide more certainty for business and more protection for the consumer.
- However effective it may be in addressing issues of concentration, efficiency and choice though, competition law is not designed to deliver plurality to the media. Although it may encourage dispersed ownership and new entry, it cannot guarantee that a significant number of different voices will continue to be heard. Nor can it address concerns over editorial freedom, or community voice. The need for additional regulation of media ownership will therefore remain.
- The Government's task is to ensure that regulation strikes the right balance, promoting a dynamic market whilst protecting the consumer.
- We are not alone in regulating media ownership. Governments in almost all other liberal democracies have imposed detailed rules to limit concentration in these markets.
- It is wrong, therefore, to say that the UK has particularly prohibitive rules, or that these rules have damaged UK companies' ability to compete internationally.

#### The case for change

- Even if they are not more severe than the rules imposed in other countries, the existing restrictions are outdated, for two reasons:
  - they have not been flexible enough to accommodate the rapid change in the nature of media markets over the last 5 years;
  - some rules appear inconsistent, and directed at particular areas of the media industries. They do not address the communications sector as a whole, or bring regulation of newspaper ownership into line with that of other media.
- We want to address these deficiencies by enacting legislation that is flexible but will also provide as much predictability for business as we can by being as even-handed as possible and making sure that no unnecessarily subjective judgements are made.
- UK industries must have every chance to compete in a global market, to grow and to attract new investment and skills.

- Communications are changing, and the barriers between media are becoming blurred. The convergence of technologies, and a greater availability of spectrum, should bring increased choice and competition, and may remove some barriers to market entry. So there may be fewer concerns in the future about the number of sources of news and information.
- In light of these developments:
  - we will be as deregulatory as possible, in the knowledge that improved competition law should be more effective at preventing companies abusing a dominant position;
  - we will look at different ways to regulate communications in the future. Some new approaches have already been tried, for example requirements for open access to 'gateways' (such as set top boxes) in pay-TV.
- However, technological developments alone cannot guarantee that new services and platforms will provide an adequate plurality of sources, and for the time being we must in any case legislate for the present situation, where most people engage with the media in its traditional forms.

#### Difficult decisions

- We aim to uphold democratic principles whilst promoting a competitive market. We want to provide flexibility, but we also need to ensure as much predictability as possible. It will be hard to strike the right balance in this area, but it is not impossible.
- Across the world, there is no consensus on the best approach to this area of regulation. These are difficult and contentious decisions, and we need to consider the matter carefully. We want to take on board as many opinions as we can, and we therefore encourage the fullest possible response to this consultation process.

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Q+A

Murdoch

Are you going to cave in and allow Murdoch free rein for expansion?

We are committed to deregulation, but we need also to retain a plurality of sources of news and opinion, to prevent any individual having excessive control over the democratic process or the news agenda. A balance must be struck.

We want to avoid making rules that are directed at any particular media company - a common criticism of the last Broadcasting Act was that it seemed to apply regulation inconsistently to different areas of the media industries.

Why no relaxation of the ban on foreign ownership - is this an explicitly anti-Murdoch measure?

As we said in the Communications White Paper, we believe the restrictions on non-European ownership play an important role in ensuring that European consumers continue to receive high quality European content. In addition, we feel that without reciprocal reforms in countries like the US or Australia that put restrictions on British companies, we cannot justify lifting our ban at the present time. Our assumption therefore remains that we will keep the existing prohibitions, although we would be willing to listen to arguments in favour of repeal.

Why are you now saying it is only your 'working assumption' that the ban on foreign ownership will be retained? Is this to leave the door open for Murdoch?

This is a consultation exercise. We still believe that the restrictions on non-European ownership play an important role in ensuring that European consumers continue to receive high quality European content. Moreover, we feel that without reciprocal reforms in countries like the US or Australia that put restrictions on British companies, we cannot justify lifting our ban at the present time, although we would be willing to listen to arguments in favour of repeal. Our assumption therefore remains that we will keep the current prohibitions on foreign ownership.

ITV

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**You've agreed to the principle of a single ITV. Can't you allow the necessary mergers now, before the companies involved go under/are acquired by foreign companies?**

We understand the importance to business of getting ahead with changes, but we need to get this right so that the legislation stands the test of time in a rapidly-changing marketplace. We need to bring forward all our proposals on media ownership as a single, coherent package in the Communications Bill. It is neither practical nor desirable to deal with this issue in a piecemeal fashion.

[If pressed]: Any such merger would in any case need to be considered carefully by the competition authorities so there is no guarantee that it would be allowed to go ahead without significant delay.

**If you're going to allow a single ITV why not allow them to own their news service?**

Most people rely on the BBC or ITV as a main source of news. The nominated news provider system, whereby ITV contracts out its news to one of the news providers nominated by the ITC, ensures the existence of a high quality and independent ITV news service that can offer competition to the BBC and other commercial news providers. At present we feel the nominated news provider system plays an important role in promoting plurality and impartiality. However there may come a time when competition has expanded to the point that this system is not needed. At this point, we recommend that OFCOM should be able to suggest its removal. We would welcome views on any of these suggestions in the consultation period.

**ITV Digital will fail if a single ITV is not allowed?**

We recognise the importance of ITV Digital. However this is a commercial matter for the companies involved.

**Is it fair that a giant foreign company could buy one of the big ITV companies but Granada and Carlton are not allowed to buy each other?**

We recognise this and are consulting on the proposal that we should lift the existing restrictions on the possibility of a single ITV.

Radio

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You are proposing to rely on competition rules for TV so why not for radio as well?

Local radio is different from TV because of the existing large choice of radio stations in most areas. This is not the case with commercial TV where there is only one service per area broadcasting at one time. We want to maintain local plurality in radio while still allowing a degree of consolidation

Newspapers

Will you definitely scrap the special regime for newspaper mergers?

We reject the view that the special newspaper regime should be completely abandoned and newspaper ownership left to be regulated by normal competition law. However, we accept that a lighter touch approach to regulation may be appropriate, and we suggest some options for this. We invite views on the different approaches we could take.

What will you do to protect the independence of local newspapers if they're no longer covered by the regime?

At the present time we are only consulting on the option of removing local newspapers from the regime, and we would welcome all opinions on this suggestion.

If we were to amend the regime, local newspaper mergers would be covered by the general merger regime just as the acquisition of any other business would.

Why are you offering the option of an exceptional public interest gateway for Ministers to consider newspaper mergers when the Enterprise Bill proposes that there be only one such gateway, for matters of national security?

As we have said previously, there are no current plans to create any exceptional public interest gateways other than that for matters of national security. However, the power will exist to create new gateways when there is a compelling case to do so in the public interest. In considering how newspapers might be regulated in the future, we are considering whether there should be a new gateway. This is only one option for consultation and the government will consider the position in light of the comments we receive.

Cross-media ownership

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Why aren't you offering any detailed proposals on cross-media ownership? Haven't you had enough time by now to think of some?

Cross-media ownership is an area in which we would welcome the fullest possible consultation, and in this paper we set out some options that take forward the debate that followed the Communications White Paper. We would welcome views both on the general approach that we should take to measuring and limiting cross-media ownership and on the particular suggestions for rules systems that we have outlined in the paper.

Religious ownership

Are you implying that you will not consider allowing religious organisations to hold national analogue broadcasting licences?

One of the options in our paper is for a complete removal of restrictions on religious organisations holding broadcasting licences. We would welcome views on this suggestion.

Our principles

Isn't it impossible to strike the balance you describe between the interests of democracy and those of industry? Which is your highest priority?

It will be difficult but not impossible to strike the correct balance. Ownership rules exist to safeguard the nature of our democracy, and the media's place in it. We recognise the need to be deregulatory in the interests of business and consumers, but this will not mean endangering the tenets of our democratic society.

Isn't competition law sufficient to ensure a plurality of owners in media markets, as it does in all other markets?

Competition rules can address issues of concentration, efficiency and choice, and they will tend to encourage dispersed ownership and new entry. The Enterprise Bill should help them to do all this more effectively. However they cannot guarantee any of it, and will not provide the certainty that we need that a significant plurality of voices will continue to be heard in the media, or that prospective new entrants will be able to add their voice. Nor can competition law directly address concerns over community voice or editorial independence.

### Communications Bill

This paper has been some time in emerging. Is the consultation period likely to delay further the introduction of the Communications Bill?

No. We are still planning to publish a draft Bill next year, which will include clauses on media ownership. Two months of consultation should give us enough time to take the necessary decisions.

Does this paper say anything more than the White Paper? Is it necessary, given the need to get legislation through as quickly as possible?

This paper is a step forward from the White Paper in a number of ways.

- We confirm our intention to remove rules on the ownership of ITV licences.
- We suggest an alternative means of regulation the ownership of radio licences.
- We suggest some ways in which we might take a lighter touch approach for newspaper mergers.
- We put forward some options for the regulation of cross-media ownership
- We suggest that media ownership rules might be made more flexible by making them subject to regular review.

It is important that we consult fully on these issues if we are to frame legislation that stands the test of time in a rapidly-changing marketplace.

~~POLICY DEVELOPMENTS SINCE THE WHITE PAPER~~1. General Prohibitions

*I We will revoke the rules preventing local authorities and advertising agencies from owning media companies, but will keep the prohibition on ownership by political organisations.*

This confirms the position in the White Paper.

*II Our working assumption remains that we will keep the current prohibitions on non-EEA ownership of broadcasters.*

This confirms the position in the White Paper, though the suggestion that changes could be considered on reciprocal basis is new.

*III Views are invited on whether we should remove all restrictions on religious organisations holding broadcasting licences, and in particular whether religious organisations should be able to hold:*

- a national digital sound programme service licence;
- a multiplex licence (local or national).

The confirms the White Paper position that the restriction on religious ownership of local digital sound programme service licences should be removed. It also asks whether other restrictions should also be removed.

2. Television

*IV We will remove the rule that prohibits single ownership of the two London ITV licences.*

This confirms the position in the White Paper.

*V We have decided to remove the rule that imposes a limit of 15% on any company's share of the television audience.*

*VI Options:*

*We could remove all restrictions on the ownership of licensed television services, leaving the matter to the competition authorities.*

*We could ensure the existence of at least 4 separately-controlled broadcasters providing free-to-air analogue television services, by preventing the joint ownership of ITV and Channel 5.*

The White Paper said "we will replace the 15% limit on share of TV audience with a new system for ensuring plurality in television services... We do not wish to put additional barriers in the way of the ITV companies, and will therefore develop a new system for ensuring plurality in television services. At its simplest, this might be achieved by retaining (*sic*) the prohibition on joint ownership of ITV and Channel 5, thus ensuring a minimum of at least four broadcasters providing free to air analogue television services (including BBC and Channel 4)" The White Paper therefore implies that nothing will replace the 15% restriction but this paper confirms that this is our intention (subject to responses to the consultation document).

[Note: The suggestion that there should be a prohibition on joint ownership of Channel 5 and ITV is new. However, this should not be stressed as the White paper incorrectly stated that such a prohibition was already in place.]

**VII We will retain the nominated news provider system for ITV, but will introduce a clause to allow the Government, on advice from OFCOM, to revoke it.**

This confirms the position in the White Paper.

**VIII We are persuaded that the current 20% limit on ownership of the nominated news provider is inconsistent with the demands of effective management and that the development of the market for news will permit liberalisation. We would welcome opinions on what ownership limit might constitute an appropriate safeguard of the news provider's independence. One option, for example, would be to raise the limit to 40%, reducing the minimum number of shareholders from five to three.**

This confirms the position in the White Paper. The option of replacing the 20% limit with a 40% limit is new.

### **3. Radio**

**IX Views are invited on whether the existing points system should be abolished in respect of UK-wide ownership. No alternative system would be established to limit total concentrations of radio ownership. It could be left to the competition authorities to determine the appropriate limits on the accumulation of radio interests on a UK-wide basis.**

**IX Views are invited on the proposals that, at the local level, OFCOM should be responsible for ensuring, via a new points system, that in every local area with a well-developed choice of radio services there are at least 3 owners of Independent Local Radio services in addition to the BBC.**

The White Paper said that "We will consider the possibility of devising a simpler, fairer regime for radio ownership to replace the current radio points system, or revoking the scheme completely." (Paragraph 4.7). The consultation document confirms that we propose to get rid of the current points system. We also propose adopting the joint proposals from the Radio Authority and the Commercial Radio Companies Association, so the details are new.

**X Views are invited on whether we should lift the specific disqualification from ownership of more than one national radio licence.**

This proposal is new.

**XI Views are invited on the suggestion that OFCOM should be responsible for instituting a scheme that ensures at least 3 owners of local digital sound programme service licences in each area, and also ensures plurality of ownership of multiplex licences.**

This would be a new arrangement. The Radio Authority and the CRCA have been discussing ways of achieving this outcome.

**XII Views are invited on whether OFCOM should be able to prevent the onward sale of licences for a two year period after their award, where it believed a change of control would jeopardise the character of the service.**

This is a new suggestion based on the Radio Authority's response to the White Paper.

#### 4. The Press

##### *XIII Options:*

*• The special newspaper regime could be reformed to give OFCOM the duty of assessing whether a particular newspaper transfer would compromise the accurate presentation of news and free expression of opinion. OFCOM would advise the Secretary of State on whether to prohibit the merger or subject it to conditions on "freedom of expression" grounds. The independent competition authorities (the Director General of Fair Trading and the Competition Commission under the proposed merger reforms in the forthcoming Enterprise Bill) would separately assess the merger on competition grounds.*

*• An alternative process could involve the repeal of the special newspaper provisions. An exceptional public interest gateway under the reformed general merger regime would be created, so that the Secretary of State could call in any newspaper merger case which gave rise to freedom of expression concerns. OFCOM could have the role of advising the Secretary of State on freedom of expression issues in such cases. The Director General of Fair Trading would advise the Secretary of State on the competition issues. The Secretary of State would be the ultimate decision maker.*

*If either option were to be adopted, we invite views on:*

- the merits of taking local titles out of the newspaper regime. In particular, we would welcome suggestions as to how "local" should be defined for this purpose;*
- the merits of extending the newspaper regime to all qualifying acquisitions, regardless of whether the potential owner is an existing newspaper proprietor or not;*
- whether the scope of controls should be revised in relation to newspaper assets;*
- whether it is appropriate to retain the criminal sanctions that underpin the regime.*

The White Paper said that we would "consider a lighter touch approach to newspaper mergers." All the above suggestions are therefore new.

#### 5. Cross-media ownership

##### *XIV Options:*

*We could retain the existing limits on cross-media ownership.*

*We could do away with cross-media limits altogether, and rely on regulations within separate media and competition law to meet our objectives.*

*We could reformulate the existing rules, attempting to incorporate the extent to which different media differ in their influence, so that, for example, newspaper owners might be more limited in the TV interests they controlled than radio owners were.*

*We could establish the same set of limits on all forms of cross-media ownership. For example, at national level, no owner might be allowed to control more than 20% of the audience in any 3 markets, or more than 30% of any two markets, regardless of the particular nature of the markets involved. A comparable system with different limits might be applied to local markets.*

*We would also welcome views as to whether the limits on cross-media ownership (whether or not they are altered) should be combined with a rule that these limits could be exceeded if the acquiring party satisfied a plurality test (An example of a plurality test is at Annex B). If so, should decisions be taken by OFCOM or by Ministers?*

The White Paper merely invited comments on reform of the cross-media ownership rules. All the

suggestions above therefore are new.

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*XV Views are invited on whether all media ownership rules should be subject to automatic review by OFCOM every 2 years. Limits could be amended through an Order by the Secretary of State on the recommendation of OFCOM. Alternatively, provisions would lapse unless their continuation was agreed by Parliament.*

Both these suggestions are new.

PROPOSED CHANGES AND THE CURRENT LEGISLATION

This note sets out briefly the relationship between the proposals in the consultation paper and the existing legislation. The existing rules are set out in more detail in an Annex to the consultation paper. It is also important to note that media ownership will continue to be covered by competition legislation.

1. General Prohibitions

*I We will revoke the rules preventing local authorities and advertising agencies from owning media companies, but will keep the prohibition on ownership by political organisations.*

Self explanatory.

*II Our working assumption remains that we will keep the current prohibitions on non-EEA ownership of broadcasters.*

Self-explanatory.

*III Views are invited on whether we should remove all restrictions on religious organisations holding broadcasting licences, and in particular whether religious organisations should be able to hold:*

- *a national digital sound programme service licence;*
- *a multiplex licence (local or national).*

At present religious organisations can supply programme content to national radio stations and, providing the regulator thinks it appropriate and subject to compliance with the guidelines, they can hold local analogue, satellite and cable licences. They are not able to apply for national analogue licences, national and local digital multiplex licences and national digital sound programme licences.

2. Television

*IV We will remove the rule that prohibits single ownership of the two London ITV licences.*

Where there is more than one regional ITV service being provided for the same area, the Broadcasting Acts prohibit the same person owning more than one of the licences for that area.

*V We have decided to remove the rule that imposes a limit of 15% on any company's share of the television audience.*

*VI Options:*

*We could remove all restrictions on the ownership of licensed television services, leaving the matter to the competition authorities.*

*We could ensure the existence of at least 4 separately-controlled broadcasters providing free-to-air analogue television services, by preventing the joint ownership of ITV and Channel 5.*

The Broadcasting Acts currently prevent anyone from holding two or more licences to provide television services which attract 15% or more of the total TV audience share.

[Note: The suggestion that there should be a prohibition on joint ownership of Channel 5 and ITV is ~~new~~. However, this should not be stressed as the White paper incorrectly stated that such a prohibition was already in place.]

*VII We will retain the nominated news provider system for ITV, but will introduce a clause to allow the Government, on advice from OFCOM, to revoke it.*

Self explanatory.

*VIII We are persuaded that the current 20% limit on ownership of the nominated news provider is inconsistent with the demands of effective management and that the development of the market for news will permit liberalisation. We would welcome opinions on what ownership limit might constitute an appropriate safeguard of the news provider's independence. One option, for example, would be to raise the limit to 40%, reducing the minimum number of shareholders from five to three.*

At present no one can own more than 20% of the nominated news provider (currently ITN).

### 3. Radio

*IX Views are invited on whether the existing points system should be abolished in respect of UK-wide ownership. No alternative system would be established to limit total concentrations of radio ownership. It could be left to the competition authorities to determine the appropriate limits on the accumulation of radio interests on a UK-wide basis.*

*IX Views are invited on the proposals that, at the local level, OFCOM should be responsible for ensuring, via a new points system, that in every local area with a well-developed choice of radio services there are at least 3 owners of Independent Local Radio services in addition to the BBC.*

*X Views are invited on whether we should lift the specific disqualification from ownership of more than one national radio licence.*

*XI Views are invited on the suggestion that OFCOM should be responsible for instituting a scheme that ensures at least 3 owners of local digital sound programme service licences in each area, and also ensures plurality of ownership of multiplex licences.*

*XII Views are invited on whether OFCOM should be able to prevent the onward sale of licences for a two year period after their award, where it believed a change of control would jeopardise the character of the service.*

Current radio points system limits licensees to 15% of the total points in the system. No one can own more than one national radio service. Of the three national licences one has to be non-pop and one predominantly speech based (there are no plans to change this requirement). Fuller details are given in an annex to the consultation paper.

### 4. The Press

*XIII Options:*

*• The special newspaper regime could be reformed to give OFCOM the duty of assessing whether a particular newspaper transfer would compromise the accurate presentation of news and free expression of opinion. OFCOM would advise the Secretary of State on whether to prohibit the merger or subject it to conditions on "freedom of expression" grounds. The independent competition authorities (the Director General of Fair Trading and the Competition Commission under the proposed merger reforms in the forthcoming Enterprise Bill) would separately assess the*

*merger on competition grounds.*

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*• An alternative process could involve the repeal of the special newspaper provisions. An exceptional public interest gateway under the reformed general merger regime would be created, so that the Secretary of State could call in any newspaper merger case which gave rise to freedom of expression concerns. OFCOM could have the role of advising the Secretary of State on freedom of expression issues in such cases. The Director General of Fair Trading would advise the Secretary of State on the competition issues. The Secretary of State would be the ultimate decision maker.*

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*If either option were to be adopted, we invite views on:*

- the merits of taking local titles out of the newspaper regime. In particular, we would welcome suggestions as to how "local" should be defined for this purpose;*
- the merits of extending the newspaper regime to all qualifying acquisitions, regardless of whether the potential owner is an existing newspaper proprietor or not;*
- whether the scope of controls should be revised in relation to newspaper assets;*
- whether it is appropriate to retain the criminal sanctions that underpin the regime.*

See Annex <sup>C</sup> to consultation paper.

## 5. Cross-media ownership

### *XIV Options:*

*We could retain the existing limits on cross-media ownership.*

*We could do away with cross-media limits altogether, and rely on regulations within separate media and competition law to meet our objectives.*

*We could reformulate the existing rules, attempting to incorporate the extent to which different media differ in their influence, so that, for example, newspaper owners might be more limited in the TV interests they controlled than radio owners were.*

*We could establish the same set of limits on all forms of cross-media ownership. For example, at national level, no owner might be allowed to control more than 20% of the audience in any 3 markets, or more than 30% of any two markets, regardless of the particular nature of the markets involved. A comparable system with different limits might be applied to local markets.*

*We would also welcome views as to whether the limits on cross-media ownership (whether or not they are altered) should be combined with a rule that these limits could be exceeded if the acquiring party satisfied a plurality test (An example of a plurality test is at Annex B). If so, should decisions be taken by OFCOM or by Ministers?*

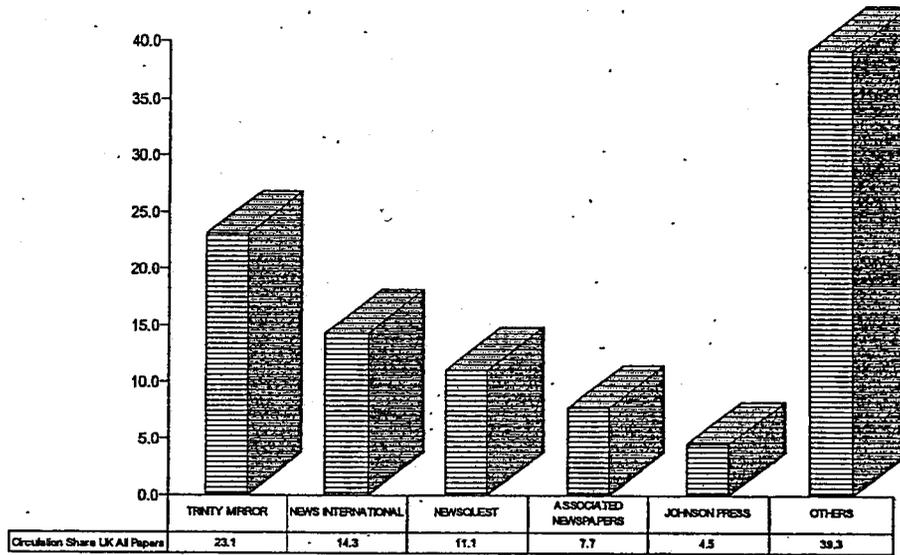
*Not covered by the current legislation.*

*XV Views are invited on whether all media ownership rules should be subject to automatic review by OFCOM every 2 years. Limits could be amended through an Order by the Secretary of State on the recommendation of OFCOM. Alternatively, provisions would lapse unless their continuation was agreed by Parliament.*

*Not covered by the current legislation.*

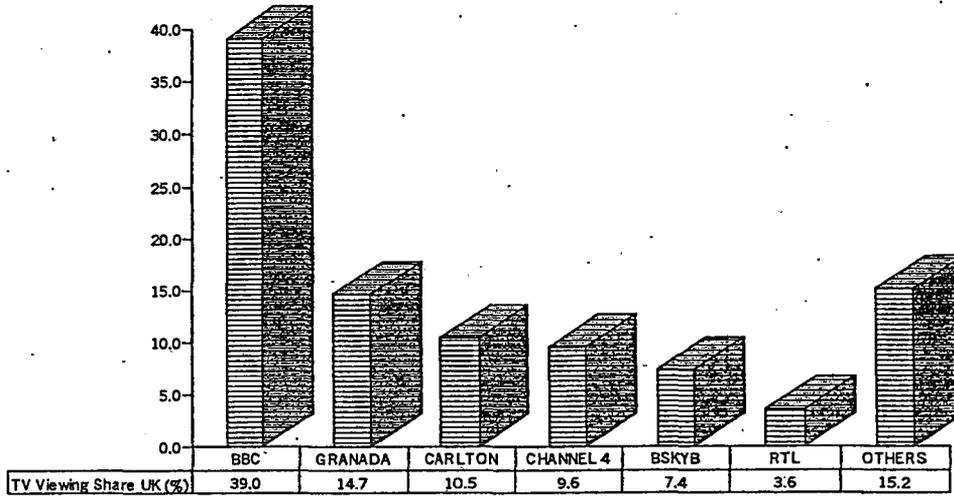
# NEWSPAPERS

National, regional, local



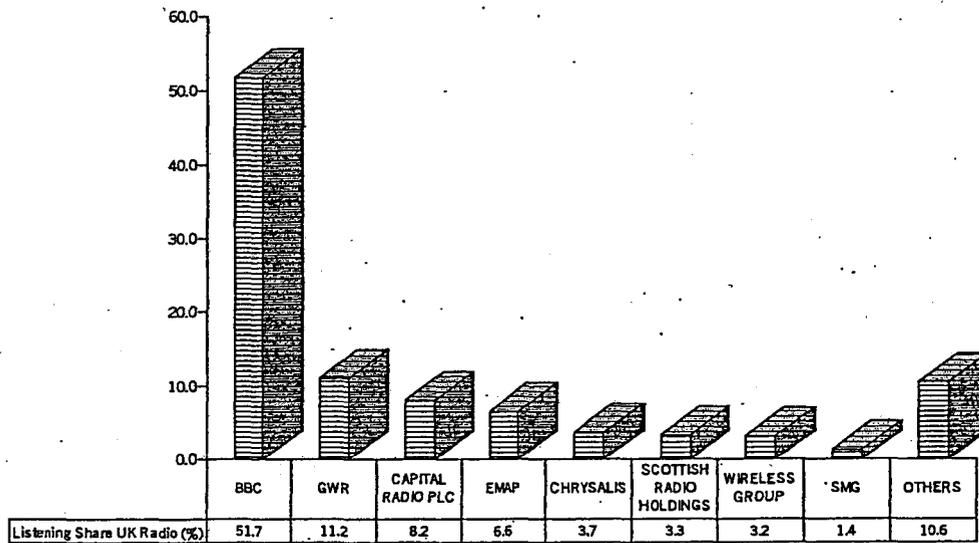
# TELEVISION

(all UK)



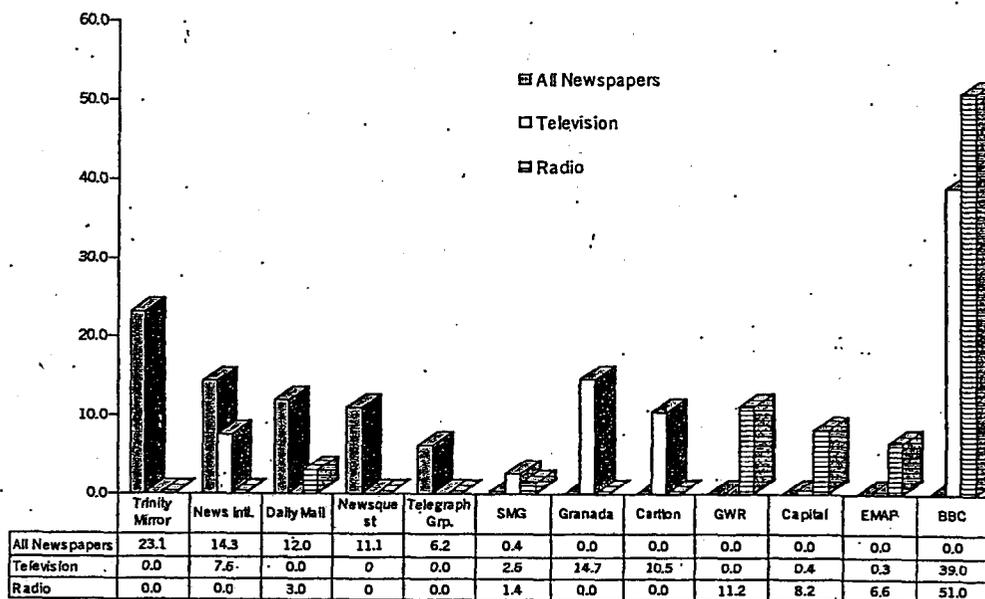
# RADIO

(all UK)

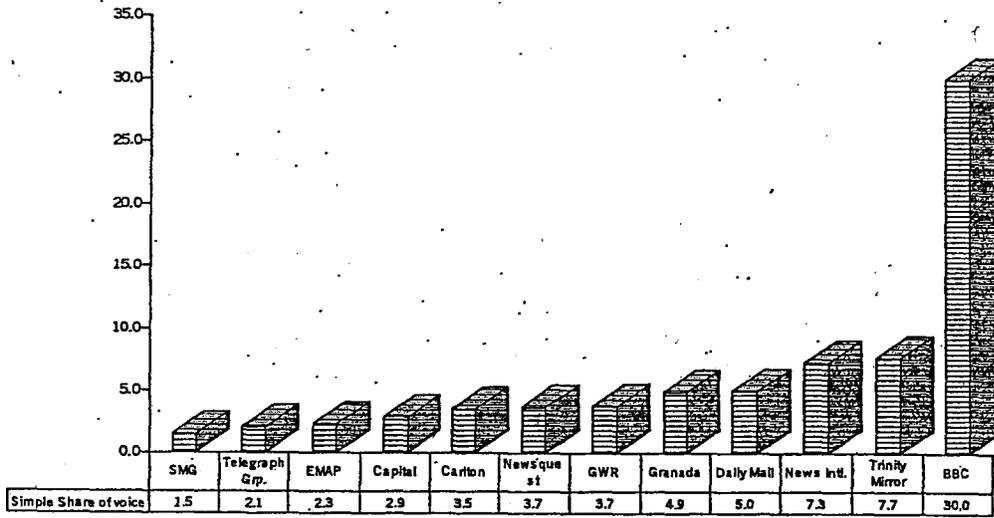


# CROSS MEDIA

Counting all national newspapers approximate percentage shares - Q1 2001



# SHARE OF VOICE



*Calculation - no explicit exchange rate between media, simple summation of percentage shares in national radio, TV, newspaper markets expressed as percentage of theoretical maximum*

# XMO SHARES

(National papers only, excluding regional/local)

